

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:)
MICHAEL J. NICOSIA) Case No. 11-32577
LYDIA F. NICOSIA) Chapter 13
Debtors.)

)

OBJECTION TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

Please take notice that the debtors, Michael Nicosia Lydia Renner, by her attorneys, DeLadurantey Law Office, LLC, by Nathan E. DeLadurantey, hereby object to the Motion for Relief from the Automatic Stay as brought by Wilmington Savings Fund Society, FSB (hereafter "Creditor").

The debtors assert that they have been making regular, consistent mortgage payments over the last two-and-one-half years (as is demonstrated by the payment ledger attached to the Creditor's motion). These regular payments are sufficient adequate protection of the Creditor's interest in the property. Additionally, the debtors request that the arrearage from missed payments in 2012 be paid through the plan pursuant to a supplemental claim. The debtors intend to continue regular payments moving forward.

The debtor respectfully requests that the Court schedule a hearing on the matter.

Dated: May 22, 2015.

DeLadurantey Law Office, LLC
Attorneys for Debtor

/s/
By: Nathan E. DeLadurantey
State Bar No. 1063937

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